



June 6, 1996
SNC-JSH-96-025

Mr. William Knoll
Department of the Navy
Code NAVSEA 08U
2531 Jefferson Davis Highway
Arlington, VA 22242-5160

9

Dear Mr. Knoll:

A Sierra Nuclear Corporation (SNC) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) prepared by the Department of the Navy and the Department of Energy (DOE). We found the DEIS to be thorough and well presented. The analyses in the DEIS clearly demonstrate that the Naval reactor fuels can be safely stored until there is a geologic repository constructed for the permanent disposal of spent nuclear fuel and high level waste.

B Based on our review of the DEIS, as well as our experience in supplying storage systems for commercial reactor spent fuel, we recommend that the Navy implement a storage program that is compatible with the DOE Civilian Radioactive Waste Management System (CRWMS). The Multi-Purpose Canister (MPC) and the Dual Purpose Canister are fully compatible with the DOE system (the Small Multi-Purpose Canister alternative is as well, but is not as economic due to the larger number of canisters and additional shipments required). There are at least five viable commercial storage systems for civilian power reactor fuels that are currently available or under development by private industry that meet the DOE Specifications for the MPC System. All of these storage systems are capable of storing Naval fuels. This existing technology and the large number of companies providing storage systems assures competitive supply sources and minimal, if any, development costs for the government.

We would appreciate being kept on your mailing list for subsequent information and for your request for proposals, when issued.

Very truly yours,

James S. Hobbs
Principal Engineer

Commenter: James S. Hobbs - Sierra Nuclear Corp., Georgia

Response to Comment:

- A. Comment noted.
- B. In Chapter 3, Section 3.8, Comparison of Alternatives, the EIS states that the impacts for most categories are small or nonexistent for all alternatives. Since 1957, the Navy has safely shipped over 660 containers of spent nuclear fuel from the shipyards and prototype sites to the Naval Reactors Facility. All of the shipments were made safely by rail and without release of radioactivity. Since any container alternative selected for dry storage and transportation (either by rail, heavy-haul truck, or a combination of both) must meet the requirements of 10 CFR Part 71, Packaging and Transportation of Radioactive Material, and 10 CFR Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Waste, other containers can also be used safely and reliably.